

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Black Dog Chicago, LLC Case No. 19-28245 Chapter 11

All Cases: Moving Creditor Parent Petroleum, Inc. Date Case Filed October 4, 2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: ☐ No-Asset Report Filed on _____

☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral

a. ☐ Home

b. ☐ Car Year, Make, and Model _____

c. ☐ Other (describe) _____

2. Balance Owed as of Petition Date \$ 4,494,655.23

Total of all other Liens against Collateral \$ _____

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$ _____

5. Default

a. ☒ Pre-Petition Default

Number of months 38 Amount \$ 4,494,655.23

b. ☐ Post-Petition Default

i. ☐ On direct payments to the moving creditor

Number of months _____ Amount \$ _____

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of months _____ Amount \$ _____

6. Other Allegations

a. ☐ Lack of Adequate Protection § 362(d)(1)

i. ☐ No insurance

ii. ☐ Taxes unpaid Amount \$ _____

iii. ☐ Rapidly depreciating asset

iv. ☐ Other (describe) _____

b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. ☒ Other "Cause" § 362(d)(1)

i. ☒ Bad Faith (describe) Debtor has no assets, no employees, no operations to reorganize

ii. ☐ Multiple Filings

iii. ☒ Other (describe) Substantially complete state court proceedings

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: January 3, 2020

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